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FILED/ACCEPTED

FEB 27 2008

Federal Communications Commission  
Office of the Secretary

**BY HAND DELIVERY**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Suite TW-A325  
Washington, DC 20554

**EB Docket No. 06-36**  
**EB-06-TC-060**

**Re: CERTIFICATION OF CPNI COMPLIANCE FILING - FEBRUARY 26, 2008**

CommuniGroup of Jackson, Inc. 499 Filer ID # 804456

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan  
JSI Staff Director-Regulatory Affairs  
[sduncan@jsitel.com](mailto:sduncan@jsitel.com)

**Attachment**

Copies: 4 additional copies to Secretary  
2 copies to Telecommunications Consumers Division  
Best Copy and Printing (BCPI)

No. of Copies rec'd 044  
List ABCDE

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**COMMUNIGROUP OF JACKSON, IN.C.**  
700 South West Street – Jackson, Mississippi 39201

Annual 47 C.F.R. Par. 64.2009(e) CPNI Certification  
EB Docket 06-36

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Federal Communications Commission  
Office of the Secretary

Date Signed: February 26, 2008

Name of Company Covered by this Certification: **CommuniGroup of Jackson, Inc.**  
**499 Filer ID 804456**

Name of signatory: James N. C. Moffat, III

Title of signatory: Executive Vice-President

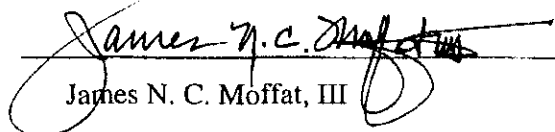
I, James N. C. Moffat, III, certify that I am an officer of the company named above ("Company"), and acting as an agent of the Company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"), see 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions against data brokers in 2007 or related to 2007. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

The Company has not received any customer complaints in the past year concerning unauthorized release of CPNI.

I hereby certify the statements contained in this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.

  
James N. C. Moffat, III

Attachment

**COMMUNIGROUP OF JACKSON, INC.**

**499 Filer ID 804456**

700 South West Street, Jackson, Mississippi 39201

**2007 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE**

February 26, 2008

This statement serves to explain how CommuniGroup of Jackson, Inc. ("Company"). is complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information ("CPNI"). The FCC's rules restricting telecommunications company use of CPNI are contained in Part 64, Subpart U of the FCC's rules (47 C.F.R. Par 64.2001 *et seq.*)

**1. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the appropriate sections of the Communications Act of 1934.

**2. Identification of Services Affected by CPNI Rules**

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

**3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

**4. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring authorization under Section 64.2007.

**5. Customer Notification and Authorization Process**

The Company has opted to use the Op-out process so that CPNI may be used for purposes of marketing telecommunications and communications-related services for all customers, except those who have notified the Company they choose not to allow use of their CPNI for marketing purposes. The Company has established procedures and has trained employees concerning the capture of the appropriate data for customers whose CPNI may not be used. The Company has implemented a record system for indication of customer Opt-Out status.

**COMMUNIGROUP OF JACKSON, INC.**  
**2007 CPNI Statement**

**6. Procedures Protecting Against Disclosure of CPNI**

During 2007, the Company implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company provides customer with on-line access to customer account information for which the Company has initiated procedures to control access in compliance with Section 64.2010© comprising authentication through a password established in compliance with Section 64.2020(3e).

The Company has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

The Company has implemented procedures to provide immediate notification to customers of account changes, including changes in address-of-record and attempts at access to CPNI through use of back-up methods due to forgotten passwords.

**7. Actions Taken Against Data Brokers**

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable.

No actions taken against data brokers

No customer complaints received

**8. Disciplinary Process**

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b)

**9. Procedures for Notifying Law Enforcement of CPNI Security Breaches**

The Company has adopted procedures to comply with 64.2011 for notifying law enforcement of CPNI security breaches, together with related record keeping and deferred notification to customers.